

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**CASSANDRA L. SMITH, Administrator
of the Estate of Jerald L. Cress
c/o Piscitelli Law Firm
8440 Station Street
Mentor, Ohio 44060**

Plaintiff,

V.

MOTION INDUSTRIES, INC.
c/o CT Corporation System
4400 Easton Commons Way, Suite 125
Columbus, Ohio 43219

Defendant.

: Case No: 1:21-cv-00985
: Judge:
:
: **MOTION FOR ADMISSION**
: ***PRO HAC VICE* OF**
: **FREDERICK L. COOPER, IV**

Pursuant to Local Rule 83.5(h), Danny Egger, counsel for Defendant Motion Industries, Inc. (“Defendant”), in the above-referenced action, hereby moves the Court to admit Frederick L. Cooper, IV *pro hac vice* and to allow him to appear and participate as counsel in this case for Defendants.

Movant represents that Frederick L. Cooper, IV is a member of good standing of the highest court of Georgia, as attested to by the accompanying Affidavit of Frederick L. Cooper, IV (Ex. 1).

This motion is accompanied by the required fee.

Mr. Cooper understands that, unless expressly excused, he must register for electronic filing with the Court promptly upon the granting of this Motion. Mr. Cooper's relevant identifying and contact information is as follows:

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Business Fax: 404-875-9433

Business address: Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC
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Email: dcooper@wwhgd.com

Respectfully submitted,

/s/ Danny Egger

Clifford C. Masch (0015737)

Danny Egger (0096903)

REMINER CO. L.P.A.

101 West Prospect Avenue

Suite 1400

Cleveland, OH 44115

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and

Jonathan R. Friedman
(Pro hac vice to be filed)
Frederick L. Cooper, IV
(Pro hac vice to be filed)
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Counsel for Motion Industries, Inc.

CERTIFICATE OF SERVICE

This is to certify that I have this date served opposing counsel with a copy of the within and foregoing pleading via Pacer, to:

Frank E. Piscitelli, Jr., Esq.
Piscitelli Law Firm
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Mentor, Ohio 44060

Eric Griebeling, Esq.
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Attorneys for Plaintiff

This 4th day of August, 2021.

/s/ Diana H. Givand

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